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Mr. Arthur Neal
Director of Program Administration, National Organic Program
1400 Independence Avenue SW
Washington DC 20250

RE: TM-04-07

Dear Mr. Neal:

In response to the advanced notice of proposed rulemaking (ANPR) impacting 7 CFR 205, we respectfully support the exemption of the following synthetic substances: hydrogen peroxide (CAS# 7722-84-1), sodium hypochlorite (CAS# 7681-52-9) and peracetic/peroxyacetic acid (CAS# 79-21-0).

These substances are efficacious against *Escherichia coli* and *Staphylococcus aureus* as determined by the EPA efficacy data requirements outlined in DIS/TSS-4.

Specific Comments

Hydrogen Peroxide

We support the renewal of hydrogen peroxide (CAS#7722-84-1) under §§205.601(a)(4), 205.603(a)(9), 205.605(b) as an allowable synthetic substance for use in organic crop and livestock production and as an ingredient allowed in or on processed product labeled "organic". Hydrogen Peroxide has been reviewed by the FDA under 21 CFR 178.1010 (b)(1), (c)(1) as safe for use on food contact surfaces, without a subsequent rinse. It has also met the EPA requirements of 40 CFR 180.940 (a) as safe for use on food processing equipment and utensils and in dairy processing.

Products containing hydrogen peroxide as an active ingredient have met the EPA Registration Requirements DIS/TSS-4. The results of this test must show a 5 log reduction of both *Escherichia coli* and *Staphylococcus aureus* to reduce the spread of foodborne illness in the paramount interest of public health.

Sodium hypochlorite

We support the renewal of sodium hypochlorite (CAS # 7681-52-9) under §§205.601(a)(2)(iii), 205.603(a)(5)(iii), 205.605(b) as an allowable synthetic substance for use in organic crop and livestock production and as an ingredient allowed in or on processed product labeled “organic”. Sodium hypochlorite has been reviewed by the FDA under 21 CFR 178.1010 (b)(1), (c)(1) as safe for use on food contact surfaces, without a subsequent rinse. It has also met the EPA requirements of 40 CFR 180.940 (a) as safe for use on food processing equipment and utensils and in dairy processing.

Peracetic/peroxyacetic acid

We support the renewal of peracetic/peroxyacetic acid (CAS# 79-21-0) under §§205.601(a)(2)(iii) as a synthetic substance for use in organic crop production. Peracetic/peroxyacetic acid has been reviewed by the FDA under 21 CFR 178.1010 (b)(1), (c)(1) as safe for use on food contact surfaces, without a subsequent rinse. It has also met the EPA requirements of 40 CFR 180.940 (a) as safe for use on food processing equipment and utensils and in dairy processing.

Products containing peracetic/peroxyacetic acid as an active ingredient have met the EPA Registration Requirements DIS/TSS-4. The results of this test must show a 5 log reduction of both the *Escherichia coli* and *Staphylococcus aureus* to reduce the spread of foodborne illness in the paramount interest of public health.

During this review, we would also like the NOSB to take under consideration listing synthetic substances by the CAS Registration Numbers to reduce confusion regarding chemical names.

Respectfully,

Ani Seumalo
Regulatory Affairs
Ecolab Inc